

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED FOOD AND COMMERCIAL WORKERS INTERNATIONAL UNION- INDUSTRY PENSION FUND, <i>et al.</i>,)	
)	
Plaintiffs,)	Civil Action No. 17-cv-05839
v.)	District Judge Kocoras
)	Magistrate Judge Schenkier
)	
PERKINS MANAGEMENT SERVICES COMPANY, INC., <i>et al.</i>,)	
)	
)	
Defendants.)	
)	

AGREED MOTION TO ENTER CONSENT JUDGMENT AND ORDER

Plaintiffs United Food and Commercial Workers International Union-Industry Pension Fund and its Trustees (“Plaintiffs”) respectfully request that this Court enter the proposed Consent Judgment and Order, attached hereto as **Exhibit 1**, and in support state as follows:

1. Plaintiffs filed their Complaint against Defendants Perkins Management Services Company, Inc., Perkins Management Services Operations, LLC, Perkins Restaurant Development Company, LLC, N.M. Perkins Enterprises, Inc., Bolt Waste Management Services Company, Perkins Gourmet Food Products, Inc., Perkins Agricultural Corporation, Perkins Burger Ventures, LLC, PMSC Holdings, and Titan Food and Nutrition Services Company (“Defendants”) on August 10, 2017.

2. The parties have reached a settlement of this litigation. Pursuant to the settlement agreement, Defendants have consented to judgment in the form of the Consent Judgment and Order executed by the parties. (*See* Ex. 1.)

3. Defendants consent to Plaintiffs moving this Court for entry of the Consent

Judgment and Order.

WHEREFORE, Plaintiffs respectfully request that the Court enter the attached Consent Judgment and Order and order judgment against the Defendants, jointly and severally.

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, David Huffman-Gottschling, an attorney, certify that I caused a copy of the foregoing document to be served upon the following person, who has acted as the representative of all Defendants, by email and by first-class mail on October 13, 2017:

Fred Lane, Chief Administrative Officer
Perkins Management Services Co.
P.O. Box 35549
Charlotte, NC 28235
flane@perkinsmanagement.com

/s/ David Huffman-Gottschling
David Huffman-Gottschling